

Edward W. Swanson, SBN 159859  
SWANSON & McNAMARA LLP  
300 Montgomery Street, Suite 1100  
San Francisco, California 94104  
Telephone: (415) 477 3800  
Facsimile: (415) 477-9010  
Email: ed@smlp.law

Court Expert

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JOHN ARMSTRONG, et al.,

Plaintiffs,

v.

GAVIN C. NEWSOM, et al.,

Defendants.

Case No. C 94-2307 CW

**ADMINISTRATIVE MOTION AND  
ORDER FOR PAYMENT**

**ADMINISTRATIVE MOTION**

Pursuant to the Court's order of June 11, 2007 (Docket No. 1121), court expert Edward Swanson hereby moves the Court for an order for payment of the attached invoice dated July 15th, 2022.

Dated: July 15th, 2022

Respectfully submitted,

/s/

EDWARD W. SWANSON

Court Expert

**ORDER**

Pursuant to the Court's order of June 11, 2007, the Court HEREBY ORDERS payment from the court registry to court expert Edward Swanson per the court expert's invoice dated July 15<sup>th</sup>, 2022.

Dated: 7/20/2022

A handwritten signature in blue ink, appearing to read 'Claudia Wilken', with a horizontal line underneath.

HON. CLAUDIA WILKEN

United States District Court

Swanson & McNamara LLP  
 300 Montgomery Street  
 Suite 1100  
 San Francisco, CA 94104  
 415-477-3800  
 EIN: 94-3309866

Invoice submitted to:  
 Armstrong

July 15, 2022

Invoice # 31326

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
6/1/2022	AAB Phone call with incarcerated person.	0.10 550.00/hr	55.00
	AAB Phone call with class member.	0.60 550.00/hr	330.00
	APG Attend Plata CMC	0.90 700.00/hr	630.00
	EWS Conference with counsel re SATF.	0.50 825.00/hr	412.50
	EWS Review filing in related case, tour report from plaintiffs.	0.30 825.00/hr	247.50
	AAB Meeting with Plaintiffs.	0.80 550.00/hr	440.00
	APG Conference with E Swanson	0.10 700.00/hr	70.00
	EWS Conference with A. Gugelmann re hearing. Respond to email from counsel.	0.20 825.00/hr	165.00
6/2/2022	AM Continue work on inputting survey responses into spreadsheet	0.40 100.00/hr	40.00
	AAB Review of notes and drafting additional document requests.	1.80 550.00/hr	990.00
	EWS Review notes from A. Barron.	0.20 825.00/hr	165.00

Armstrong

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
6/2/2022	AAB Preparation for SATF Staff interview.	0.40 550.00/hr	220.00
	AAB Interview of SATF Staff	1.60 550.00/hr	880.00
	EWS Meeting with counsel re matrix (partial attendance).	0.60 825.00/hr	495.00
6/3/2022	AAB Interview of SATF Staff	1.80 550.00/hr	990.00
	AAB Reviewing interview notes and drafting information requests.	2.00 550.00/hr	1,100.00
	APG Conference with E Swanson re CTS issues	0.20 700.00/hr	140.00
	CB Phone call with inmate re SATF.	0.20 225.00/hr	45.00
	APG Phone call with parties re CST updates	0.70 700.00/hr	490.00
	EWS Conference with A. Gugelmann re conference call.	0.20 825.00/hr	165.00
6/6/2022	AAB Scheduling follow up interviews.	0.20 550.00/hr	110.00
	AAB Review of Plaintiffs' production letter.	0.60 550.00/hr	330.00
	EWS Conference with A. Barron. Review and comment on minutes of coordination meeting.	0.30 825.00/hr	247.50
	EWS Review reports on quarterly productions.	0.80 825.00/hr	660.00
6/7/2022	AAB Meeting with E. Swanson.	1.40 550.00/hr	770.00
	AAB Interview of ADAC.	3.10 550.00/hr	1,705.00
	APG Review letter re quarterly production. Emails with E Swanson	0.70 700.00/hr	490.00
	EWS Conference with A. Barron re SATF.	1.40 825.00/hr	1,155.00
	EWS Interview with SATF Staff. Conference with A. Barron.	3.10 825.00/hr	2,557.50

Armstrong

Page 3

		<u>Hrs/Rate</u>	<u>Amount</u>
6/7/2022	AAB Review of Q1 SATF letter from plaintiffs.	0.90 550.00/hr	495.00
	EWS Review correspondence from coordinating committee.	0.10 825.00/hr	82.50
6/8/2022	AAB Preparation for SATF Staff interview.	0.40 550.00/hr	220.00
	AAB Interview with SATF Staff	1.00 550.00/hr	550.00
	AAB Review of notes and drafting additional doc requests.	0.60 550.00/hr	330.00
	APG Review calprotect report on covid	0.40 700.00/hr	280.00
	EWS Meeting with coordinating committee.	0.70 825.00/hr	577.50
	EWS Interview with SATF Staff	1.00 825.00/hr	825.00
	EWS Conference with counsel re program data.	1.50 825.00/hr	1,237.50
	EWS Phone call with counsel.	0.20 825.00/hr	165.00
	EWS Preparation for court coordination meeting.	0.30 825.00/hr	247.50
6/9/2022	AAB Phone call with court.	0.70 550.00/hr	385.00
	EWS Conference with court.	0.60 825.00/hr	495.00
	EWS Conference with parties re SATF tour.	0.50 825.00/hr	412.50
6/10/2022	AAB Preparation for interview of SATF Staff	0.20 550.00/hr	110.00
	AAB Drafting document requests.	0.60 550.00/hr	330.00
	AAB Phone call with E. Swanson.	0.20 550.00/hr	110.00
	AAB Meeting with plaintiffs.	0.30 550.00/hr	165.00

Armstrong

Page 4

			<u>Hrs/Rate</u>	<u>Amount</u>
6/10/2022	AAB	Drafting doc requests.	2.70 550.00/hr	1,485.00
	AAB	Conference with office manager regarding handling calls from incarcerated people at SATF.	0.10 550.00/hr	55.00
	AAB	Emails regarding scheduling follow up calls.	0.10 550.00/hr	55.00
	AAB	Meeting with SATF Staff	0.40 550.00/hr	220.00
	APG	Review correspondence and conference with E Swanson re production issues	0.20 700.00/hr	140.00
	EWS	Review emails from counsel. Confer with colleagues.	0.20 825.00/hr	165.00
	EWS	Conference with A. Barron. Call with counsel.	0.50 825.00/hr	412.50
6/13/2022	EWS	Conference with A. Gugelmann re quarterly reporting.	0.20 825.00/hr	165.00
	EWS	Review emails from counsel re tours, proposed language changes. Confer with A. Barron.	0.40 825.00/hr	330.00
	APG	Conference with E Swanson	0.20 700.00/hr	140.00
6/14/2022	AAB	Review of class member voicemails.	0.70 550.00/hr	385.00
	AAB	Meeting with CDCR counsel.	0.30 550.00/hr	165.00
	AAB	Phone call with class members' family.	0.20 550.00/hr	110.00
	AAB	Phone call with class member's family.	0.20 550.00/hr	110.00
	AAB	Meeting with E. Swanson re document requests.	1.10 550.00/hr	605.00
	EWS	Conference with counsel re document production.	0.40 825.00/hr	330.00
	EWS	Conference with A. Barron re inquiries re SATF. Email to counsel.	0.30 825.00/hr	247.50
	EWS	Conference with A. Barron re document requests.	0.90 825.00/hr	742.50

Armstrong

Page 5

			<u>Hrs/Rate</u>	<u>Amount</u>
6/15/2022	AAB	Meeting with E. Swanson regarding document requests.	0.60 550.00/hr	330.00
	AAB	Review of survey spreadsheet.	0.20 550.00/hr	110.00
	AAB	Meeting with staff regarding survey responses.	0.50 550.00/hr	275.00
	AAB	Interview of SATF Staff and debrief with E. Swanson.	1.50 550.00/hr	825.00
	AAB	Revising and sending additional document requests.	0.50 550.00/hr	275.00
	EWS	Conference with A. Barron re document requests.	0.60 825.00/hr	495.00
	EWS	Conferences with A. Gugelmann re quarterly reports.	0.90 825.00/hr	742.50
	EWS	Interview of SATF Staff Conference with A. Barron.	1.50 825.00/hr	1,237.50
	EWS	Conference with A. Gugelmann. Respond to emails from counsel.	0.20 825.00/hr	165.00
	EWS	Review information from A. Gugelmann re quarterly reports, information from parties.	0.40 825.00/hr	330.00
	APG	Conference with E. Swanson. Respond to emails from counsel.	0.20 700.00/hr	140.00
	APG	Review footage re RJD allegations	0.60 700.00/hr	420.00
	APG	Meeting with E Swanson re quarterly reporting	0.90 700.00/hr	630.00
	EWS	Conference with colleagues re surveys.	0.40 825.00/hr	330.00
6/16/2022	AAB	Review of documents from CDCR.	1.10 550.00/hr	605.00
	AAB	Review of documents from CDCR.	3.10 550.00/hr	1,705.00
	EWS	Review SATF report.	1.00 825.00/hr	825.00
	EWS	Conference with counsel re reporting.	1.00 825.00/hr	825.00

Armstrong

Page 6

		<u>Hrs/Rate</u>	<u>Amount</u>
6/16/2022	EWS Review and respond to emails from counsel.	0.10 825.00/hr	82.50
	APG Conference with E Swanson in advance of meeting with plaintiffs	0.50 700.00/hr	350.00
	APG Review material in advance of call with plaintiffs. Email E Swanson re quarterly productions	0.50 700.00/hr	350.00
	APG Meeting with plaintiffs re RJD, SATF reports	1.00 700.00/hr	700.00
	EWS Review and respond to emails from counsel.	0.20 825.00/hr	165.00
	EWS Conference with A. Gugelmann.	0.50 825.00/hr	412.50
6/17/2022	AAB Meeting with CCHCS.	1.00 550.00/hr	550.00
	APG Conferences with E Swanson re quarterly reporting, outline issue for reporting, review prior orders	1.50 700.00/hr	1,050.00
	EWS Conference with A. Barron. Meeting with CCHCS.	1.00 825.00/hr	825.00
	EWS Conference with A. Gugelmann re quarterly reports.	0.70 825.00/hr	577.50
	AAB Review of OIG report and memo to E. Swanson re same.	4.90 550.00/hr	2,695.00
6/20/2022	AAB Review of materials related to SATF.	3.90 550.00/hr	2,145.00
	APG Review issues for quarterly monitoring; review remedial plan and orders	0.50 700.00/hr	350.00
	APG Conference with E Swanson re quarterly reporting	0.20 700.00/hr	140.00
	EWS Conference with A. Gugelmann.	0.20 825.00/hr	165.00
	EWS Review SATF information from A. Barron. Confer with A. Barron.	0.60 825.00/hr	495.00
	EWS Draft email to counsel re quarterly reporting.	0.70 825.00/hr	577.50
	AAB Phone call with E. Swanson.	0.40 550.00/hr	220.00



Armstrong

Page 7

			<u>Hrs/Rate</u>	<u>Amount</u>
6/21/2022	AAB	Email with plaintiffs re scheduling.	0.10 550.00/hr	55.00
	AAB	Review of materials from class memeber	0.70 550.00/hr	385.00
	EWS	Review and respond to emails from counsel, CCHCS. Review filings in related case.	0.40 825.00/hr	330.00
	EWS	Review correspondence from plaintiffs re program assignments, CDCR re COVID reporting.	0.20 825.00/hr	165.00
6/22/2022	AAB	Preparation for class member interview.	1.40 550.00/hr	770.00
	AAB	Interview of class member.	1.70 550.00/hr	935.00
	AAB	Phone call with E. Swanson.	0.30 550.00/hr	165.00
	APG	Review information re CST; emails with Ed Swanson	0.20 700.00/hr	140.00
	EWS	Interview of class member. (Partial attendance)	1.20 825.00/hr	990.00
	EWS	Conference with A. Barron.	0.30 825.00/hr	247.50
	EWS	Review email from counsel re blind/low-vision. Review and respond to email re matrix.	0.20 825.00/hr	165.00
	APG	Review updates on blind/low-vision accommodations and covid reporting	0.20 700.00/hr	140.00
	EWS	Conference with A. Barron. Review email from counsel. Conference with A. Gugelmann.	0.30 825.00/hr	247.50
6/23/2022	AAB	Interview of healthcare AW.	1.40 550.00/hr	770.00
	APG	Meeting with parties re quarterly reporting	0.60 700.00/hr	420.00
	EWS	Conference with A. Gugelmann in advance of call with counsel.	0.10 825.00/hr	82.50
	EWS	Conference with counsel re RJD production.	0.50 825.00/hr	412.50
	EWS	Conference with Health Care AW.	1.40 825.00/hr	1,155.00

Armstrong

Page 8

		<u>Hrs/Rate</u>	<u>Amount</u>
6/23/2022	EWS Conference with parties re quarterly reports.	0.50 825.00/hr	412.50
	EWS Conference with A. Gugelmann re quarterly report.	0.50 825.00/hr	412.50
	EWS Conference with A. Barron re doc production.	0.20 825.00/hr	165.00
	EWS Conference with A. Gugelmann re RJD report.	0.10 825.00/hr	82.50
	EWS Review RJD report.	0.60 825.00/hr	495.00
	AAB Conference with E. Swanson re doc production.	0.20 550.00/hr	110.00
	AAB Preparation for interview of healthcare AW.	0.30 550.00/hr	165.00
	AAB Phone call with E. Swanson.	0.30 550.00/hr	165.00
	APG Conference with E Swanson	0.10 700.00/hr	70.00
	APG Review emails re quarterly productions; email E Swanson	0.20 700.00/hr	140.00
	EWS Conference with A. Barron re interviews.	0.30 825.00/hr	247.50
6/24/2022	AAB Meeting with E. Swanson.	2.10 550.00/hr	1,155.00
	APG Meeting with plaintiffs re reporting	1.50 700.00/hr	1,050.00
	APG Draft quarterly report. Review remedial orders. Review notes of party meetings.	1.10 700.00/hr	770.00
	EWS Review RJD report.	0.60 825.00/hr	495.00
	EWS Conference with counsel re RJD report.	1.50 825.00/hr	1,237.50
	APG Conference with E Swanson in advance of call with plaintiffs	0.20 700.00/hr	140.00
	EWS Conference with A. Gugelmann.	0.20 825.00/hr	165.00

Armstrong

Page 9

		<u>Hrs/Rate</u>	<u>Amount</u>
6/24/2022	EWS Conference with A. Barron re report. Call to plaintiffs' counsel.	2.10 825.00/hr	1,732.50
6/26/2022	EWS Review correspondence from counsel. Review new CDO training.	0.30 825.00/hr	247.50
	EWS Review emails re master plan and respond.	0.20 825.00/hr	165.00
6/27/2022	EWS Review correspondence from counsel.	0.40 825.00/hr	330.00
6/28/2022	AAB Meeting with staff regarding exit interviews.	0.90 550.00/hr	495.00
	EWS Conference with SATF, parties re SATF visit. Conference with A. Barron.	0.90 825.00/hr	742.50
	EWS Review information from plaintiffs re SATF.	0.20 825.00/hr	165.00
6/29/2022	AAB Meeting with parties re RVRs.	0.90 550.00/hr	495.00
	AAB Meeting with CDCR counsel.	0.60 550.00/hr	330.00
	AAB Meeting with Plaintiff's counsel.	0.60 550.00/hr	330.00
	EWS Conference with counsel re RVR.	0.90 825.00/hr	742.50
	EWS Conference with counsel for CDCR.	0.50 825.00/hr	412.50
	EWS Conference with plaintiffs' counsel.	0.50 825.00/hr	412.50
6/30/2022	EWS Review correspondence from plaintiffs re RJD.	0.20 825.00/hr	165.00
	APG Finalize and file quarterly report	0.40 700.00/hr	280.00
	EWS Review and edit quarterly report.	0.30 825.00/hr	247.50
	For professional services rendered	<u>109.70</u>	<u>\$73,435.00</u>

Armstrong

Page 10

## Additional Charges :

	<u>Amount</u>
6/9/2022 Conference Call	4.41
Total additional charges	<u>\$4.41</u>
Total amount of this bill	<u>\$73,439.41</u>
Previous balance	\$124,072.81
Accounts receivable transactions	
6/13/2022 Payment - thank you	<u>(\$124,072.81)</u>
Total payments and adjustments	<u>(\$124,072.81)</u>
Balance due	<u><u>\$73,439.41</u></u>

## Timekeeper Summary

Name	Hours	Rate	Amount
Amy McGuigan - Paralegal	0.40	100.00	\$40.00
Audrey Barron - Associate	54.30	550.00	\$29,865.00
August P. Gugelmann - Partner	13.80	700.00	\$9,660.00
Carly Bittman - Associate	0.20	225.00	\$45.00
Edward W. Swanson - Partner	41.00	825.00	\$33,825.00